

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

THE UNDERWRITING MEMBERS OF LLOYD'S SYNDICATES 2, 53, 55, 205, 228, 271, 376, 510, 529, 535, 557, 588, 672, 807, 861, 991, 1003, 1121, 1209, 1236, 1243, 1308, 2003, AND 2020; MARLON INSURANCE COMPANY LIMITED; THE COPENHAGEN REINSURANCE COMPANY (U.K.) LIMITED; UNIONAMERICA INSURANCE COMPANY LIMITED; SCOR GLOBAL P&C SE; SCOR UK COMPANY LIMITED; SCOR REINSURANCE ASIA-PACIFIC PTE LIMITED; SCOR REINSURANCE COMPANY (ASIA) LIMITED; SCOR REINSURANCE COMPANY; GENERAL SECURITY NATIONAL INSURANCE COMPANY; GENERAL SECURITY INDEMNITY COMPANY OF ARIZONA; SCOR CANADA REINSURANCE COMPANY; LIBERTY MUTUAL INSURANCE COMPANY; AMERICAN ECONOMY INSURANCE COMPANY; AMERICAN FIRE AND CASUALTY COMPANY; EMPLOYERS INSURANCE COMPANY OF WAUSAU; EXCELSIOR INSURANCE COMPANY; THE FIRST LIBERTY INSURANCE CORPORATION; GENERAL INSURANCE COMPANY OF AMERICA; INDIANA INSURANCE COMPANY; LIBERTY INSURANCE CORPORATION; LIBERTY INSURANCE UNDERWRITERS, INC.; LIBERTY LIFE ASSURANCE COMPANY OF BOSTON; LIBERTY LLOYDS OF TEXAS INSURANCE COMPANY; LIBERTY MUTUAL FIRE INSURANCE COMPANY; LM INSURANCE CORPORATION; LM PROPERTY AND CASUALTY INSURANCE COMPANY; LIBERTY MANAGING AGENCY LIMITED FOR AND ON BEHALF OF THE LLOYD'S UNDERWRITING MEMBERS FROM

CIVIL ACTION NO.: 3 : 16 - cv - 19

**JURY TRIAL DEMANDED**

<p>TIME TO TIME OF LLOYD’S SYNDICATES 4472, 190 AND 282; LIBERTY MUTUAL INSURANCE EUROPE LIMITED; THE MIDWESTERN INDEMNITY COMPANY; THE NETHERLANDS INSURANCE COMPANY; THE OHIO CASUALTY INSURANCE COMPANY; PEERLESS INSURANCE COMPANY; SAFECO INSURANCE COMPANY OF AMERICA; WAUSAU BUSINESS INSURANCE COMPANY; WAUSAU UNDERWRITERS INSURANCE COMPANY; WEST AMERICAN INSURANCE COMPANY; AMERICAN SAFETY INDEMNITY COMPANY; AMERICAN SAFETY CASUALTY INSURANCE COMPANY; ODYSSEY REINSURANCE COMPANY; AND QBE INSURANCE (INTERNATIONAL) LTD.</p> <p>Plaintiffs,</p> <p>v.</p> <p>AL RAJHI BANK, NATIONAL COMMERCIAL BANK, AND SAUDI BINLADIN GROUP</p> <p>Defendants.</p>	
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### **DISCLOSURE STATEMENT**

Pursuant to Local Rule 7.1.1 of the Western District of Pennsylvania and to enable Judges and Magistrate Judges to evaluate possible disqualification or recusal, the undersigned counsel for Plaintiffs in the above-captioned action certifies the following:

Plaintiffs Underwriting Members of Lloyd’s Syndicates 510, 557, and 807 are members of Tokio Marine Kiln Insurance Services Limited. Plaintiffs Underwriting Members of Lloyd’s

Syndicates 510, 557, and 807 certify that Tokio Marine Holdings, Inc. is a parent of Tokio Marine Kiln Insurance Services Limited that has issued shares or debt securities to the public.

Plaintiffs Underwriting Members of Lloyd's Syndicates 2, 271, 376, and 535 are members of RiverStone Insurance (UK) Limited. Plaintiffs Underwriting Members of Lloyd's Syndicates 2, 271, 376, and 535 certify that Fairfax Financial Holdings Limited is a parent of RiverStone Insurance (UK) Limited that has issued shares or debt securities to the public.

Plaintiffs Marlon Insurance Company and Underwriting Members of Lloyd's Syndicates 53, 55, 205, 228, 529, 991, 1121, 1236, 1243, and 1308 are members of Enstar (EU) Limited. Plaintiffs Marlon Insurance Company and Underwriting Members of Lloyd's Syndicates 53, 55, 205, 228, 529, 991, 1121, 1236, 1243, and 1308 certify that Enstar Group Limited is a parent of Enstar (EU) Limited that has issued shares or debt securities to the public.

Plaintiffs Liberty Mutual Insurance Company, American Economy Insurance Company, Employers Insurance Company of Wausau, Excelsior Insurance Company, The First Liberty Insurance Corporation, General Insurance Company of America, Indiana Insurance Company, Liberty Insurance Corporation, Liberty Insurance Underwriters, Inc., Liberty Life Assurance Company of Boston, Liberty Lloyds of Texas Insurance Company, Liberty Management Agency Limited for and on behalf of the Lloyd's Underwriting Members from time to time of Lloyd's Syndicates 4472, 190, and 282, Liberty Mutual Fire Insurance Company, LM Insurance Company, LM Property and Casualty Insurance Company, Liberty Mutual Insurance Europe Limited, The Midwestern Indemnity Company, The Netherlands Insurance Company, The Ohio Casualty Insurance Company, Peerless Insurance Company, Safeco Insurance Company of America, Wausau Business Insurance Company, Wausau Underwriters Insurance Company, and West American Insurance Company are entities with an ultimate parent of Liberty Mutual

Holding Company, Inc. and those entities certify that they have no parents, subsidiaries and/or affiliates that have issued shares or debt securities to the public.

Plaintiffs Underwriting Members of Lloyd's Syndicates 672, 1003, and 2020 comprise various companies and individuals who have transferred their financial interests to Lloyd's Syndicate 2003, the sole member of which is a private company wholly owned ultimately by XL Group plc. Plaintiffs Underwriting Members of Lloyd's Syndicates 588 and 861 comprise various companies and individuals who have transferred their financial interests to Lloyd's Syndicate 2008 which is ultimately owned by Enstar Group Limited (for which see above). Plaintiff Lloyd's Syndicate 1209 comprise members which are a private companies wholly ultimately owned by XL Group plc. Plaintiffs Underwriting Members of Lloyd's Syndicates 672, 1003, 1209, 2003, and 2020 certify that XL Group plc is a company listed on the NY Stock Exchange and registered in Ireland and has issued shares to the public and that XLIT Ltd. is wholly owned by XL Group plc and has issued debt securities to the public.

Plaintiffs American Safety Indemnity Company, American Safety Casualty Insurance Company, and Odyssey Reinsurance Company certify that Fairfax Financial Holdings Limited, Fairfax India Holdings Corporation, American Safety Insurance Holdings Ltd. and Ridley Inc. are parents, subsidiaries and/or affiliates of said parties that have issued shares or debt securities to the public.

Plaintiff QBE Insurance (International) Ltd. certifies that QBE Insurance Group Ltd. is a parent of said party that has issued shares or debt securities to the public.

Plaintiff American Fire & Casualty Company certifies that there are no parents, subsidiaries and/or affiliates of said party that have issued shares or debt securities to the public.

Plaintiff The Copenhagen Reinsurance Company (U.K.) Limited certifies that there are no parents, subsidiaries and/or affiliates of said party that have issued shares or debt securities to the public.

Plaintiff UnionAmerica Insurance Company Limited certifies that there are no parents, subsidiaries and/or affiliates of said party that have issued shares or debt securities to the public.

Plaintiffs SCOR Global P&C SE, SCOR UK Company Limited, SCOR Reinsurance Asia-Pacific Pte Limited, SCOR Reinsurance Company (Asia) Limited, SCOR Reinsurance Company, General Security National Insurance Company, General Security Indemnity Company of Arizona, and SCOR Canada Reinsurance Company certify that there are no parents, subsidiaries and/or affiliates of said parties that have issued shares or debt securities to the public.

COZEN O'CONNOR

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